

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

---

**Case No.: 15-30451**  
**Judge: G. Michael**  
**Halfenger**  
**Chapter: Chapter 13**

**In Re: Randey D Anderson  
Regina A Anderson**

---

**NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN**

---

Geraci Law, LLC, Attorneys for the Debtors, have filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, on or before 21 days from the date of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk, U.S. Bankruptcy Court  
517 E. Wisconsin Ave., Rm. 126  
Milwaukee, WI 53202

If you mail your request or response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to the parties listed below and on the attached mailing matrix:

Felicia Marie Petroff  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-6052  
Fax: (877) 247-1960  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

United States Trustee  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 430  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Geraci Law, LLC  
Felicia Marie Petroff  
2505 N. Mayfair Rd. #101  
Wauwatosa, WI 53226

Randey D Anderson  
Regina A Anderson  
4339 N 36th St  
Milwaukee, WI 53216

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

### **REQUEST TO MODIFY CHAPTER 13 PLAN**

1. The Proponents of this modification are the Debtors, through their Attorneys, Geraci Law, LLC.
2. This is a request to modify a Chapter 13 Plan (Select A. or B.):
  - A. \_\_\_\_\_ post-confirmation
  - B.   X   pre-confirmation (Select i. or ii.):
    - i.   X   Debtors/Debtors' attorney certifies that the proposed modification does not materially adversely affect creditors (Local Bankruptcy Rule 3015(b)); or
    - ii. \_\_\_\_\_ Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors are (See Attached List).
3. The Proponent wishes to modify the Chapter 13 Plan to do the following: See Below.
4. The reason for the modification is to correct a typographical error.

5. Select A. or B.

A. \_\_\_\_\_ The confirmed Chapter 13 Plan is modified as follows:

B.   X   The unconfirmed Chapter 13 Plan is modified as follows: The original Plan incorrectly names the vehicle financed with WFDS as a 2009 Mazda MKS. It is actually a 2009 Lincoln MKS.

C. All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the event of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

**6. BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

WHEREFORE, the Proponent requests that the Court approve the modification to the Chapter 13 Plan as stated herein.

Respectfully submitted and dated this Wednesday, October 28, 2015.

By: /s/ Felicia Marie Petroff  
Felicia Marie Petroff  
Attorney for Debtor  
Bar #: 1066358

Felicia Marie Petroff  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-6052  
Fax: (877) 247-1960  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

---

**Case No.: 15-30451**  
**Judge: G. Michael**  
**Halfenger**  
**Chapter: Chapter 13**

**In Re: Randey D Anderson  
Regina A Anderson**

---

**CERTIFICATE OF SERVICE**

---

The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Notice and Request to Modify Chapter 13 Plan were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Wednesday, October 28, 2015:

Randey Anderson  
Regina A Anderson  
4339 N 36th St  
Milwaukee, WI 53216

Wells Fargo Bank N.A.  
d/b/a Wells Fargo Dealer Services  
PO Box 19657  
Irvine, CA 92623

Additionally, the documents referenced above were also served via electronic means on the following individuals on Wednesday, October 28, 2015:

United States Trustee  
Eastern District of Wisconsin  
517 E. Wisconsin Ave.  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Dated this Wednesday, October 28, 2015.

By: /s/ Felicia Marie Petroff  
Felicia Marie Petroff  
Attorney of the Debtor  
Bar #: 1066358

Felicia Marie Petroff  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-6052  
Fax: (877) 247-1960  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

Rec. No: «c\_recordno»  
Notice and Request to Modify Chapter 13 Plan